

JEREMY J. THOMPSON
Nevada Bar No. 12503
CLARK HILL PLLC
3800 Howard Hughes Drive, Suite 500
Las Vegas, Nevada 89169
E-mail: jthompson@clarkhill.com
Telephone: (702) 862-8300
Facsimile: (702) 862-8400
Attorney for Defendant
National Consumer Telecom & Utilities
Exchange, Inc.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SALLY SOTO, individually as heir and as
Special Administrator for the Estate of JOSEPH
SOTO, deceased.

Plaintiff,

V.

ST. JOSEPH TRANSITIONAL
REHABILITATION CENTER, LLC, doing
business as ST. JOSEPH TRANSITIONAL
REHABILITATION CENTER; and DOES 1
through 10, inclusive; and ROE ENTITIES 1
through 10, inclusive,

Defendants.

Case No. 2:21-cv-01728-RFB-EJY

**JOINT STIPULATION FOR
EXTENSION OF TIME FOR
DEFENDANT TO RESPOND TO
PLAINTIFF'S MOTION TO REMAND**

FIRST REQUEST

Defendant St. Joseph Transitional Rehabilitation Center, LLC d/b/a/ St. Joseph Rehabilitation Center has requested an extension of time to respond to plaintiff's Motion to Remand (ECF No. 9), to which plaintiff has no opposition. Accordingly, pursuant to LR IA 6-2, IT IS HEREBY STIPULATED AND AGREED to by and among counsel, that St. Joseph's time to respond to the Motion to Remand in this action is extended from October 29, 2021 through and including **November 15, 2021**. The request was made by St. Joseph so that it has sufficient opportunity to time review Mr. Soto's medical records, which are approximately 2,000 pages, and

1 Plaintiff approves. This stipulation is filed in good faith and not intended to cause delay.

2 Respectfully submitted, this 29th day of October, 2021.

3 CLARK HILL PLLC

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5 By:/s/ *Jeremy J. Thompson*
6 JEREMY THOMPSON, Esq.
7 Nevada Bar No. 12503
8 CLARK HILL PLC
9 3800 Howard Hughes Pkwy, Suite 500
Las Vegas, NV 89169
Attorneys for Defendant

No opposition

/s/*Andrew Thomas*
Steven M. Burris, Esq.
sb@steveburrislaw.com
Andrew J. Thomas, Esq.
at@steveburris.com
BURRIS & THOMAS, LLC
2810 W. Charleston Blvd., Suite F-58
Las Vegas, Nevada 89102
Attorneys for Plaintiff

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11 **IT IS SO ORDERED:**

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14 **RICHARD E. BOULWARE, II**
15 **United States District Court**

16 DATED this 1st day of November, 2021.